

REMARKS

Claims 1-18 are pending. Reconsideration and allowance of these claims is respectfully requested.

Claims 1-6, 8-10, 12-14 and 18 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,049,799 to Mangat et al. ("Mangat"). Applicants respectfully traverse this rejection since each and every element of the claims are not expressly or inherently described

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference," Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987); see also MPEP § 2131. "The identical invention must be shown in as complete detail as is contained in the ... claim." Richardson v. Suzuki Motor Co., 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Mangat, for example, fails to teach each and every element of claims 1 and 3.

For example, none of the paragraphs of Mangat cited by the Office Action discloses "a directory that stores the link relationships [between document objects]" or "storing the link relationship [between document objects] in one or more link directories," as recited in claims 1 and 3, respectively. In fact, no link relationships are stored in Mangat's Document Locator table. The Examiner now cites Mangat col. 7, lines 13-20 as disclosing these features. However, this cited section merely discloses a directory tree of objects (see FIG. 2). Mangat does not teach this directory tree includes link relationships between document objects. Indeed, Mangat specifically teaches "an object of the invention to provide a method and apparatus for updating links between documents (*e.g.*, linking information) without burdening a network directory services system with the maintenance of *document linking information*." Col. 2, lines 31-35. Consequently, Mangat does not disclose or suggest a directory that stores the link relationships or storing the link relationship in one or more link directories. Therefore, Mangat does not anticipate claims 1 or 3. For these same reasons, and the independent features they recite, Mangat does not anticipate dependent claims 2, 4-6, 8-10, 12-14 and 18.

Mangat also does not teach retrieving document objects not previously available to a user on the network or making available documents not located on the network to a user, as recited in claims 1 and 18, respectively. In the section cited by the Examiner (col. 7, lines 46-55), Mangat specifically states that the desired document is not available and that the system of Mangat

instead locates a *similar* document, not the unavailable document. Col. 7, lines 47-55. Consequently, Mangat does not anticipate claims 1 and 18. For these same reasons, and the independent features they recite, Mangat does not anticipate dependent claims 2, 4-6, 8-10, and 12-14.

Claims 7, 15 and 16 are rejected under 35 U.S.C. § 103(a) over Mangat in view of U.S. Patent No. 6,209,036 to Aldred et al. ("Aldred"). Aldred does not cure the defects of Mangat with respect to claim 3. Therefore, these claims are allowable for at least the same reasons recited above and their own independent features. For example, Aldred does not disclose "assigning a network address to the first document object ... storing the network address for the first document object in the link relationship," as recited in claim 7. Likewise, Aldred does not disclose a method "wherein the network address for the first document object is stored in a network address field of a link reference to the first document object," as recited in claim 15. Further, Aldred does not disclose "wherein the created link relationship comprises a link reference including a network address containing a bookmark," as recited in claim 16. Allowance of claims 7, 15, and 16 is respectfully requested.

Claims 11 and 17 are rejected under 35 U.S.C. § 103(a) over Mangat in view of U.S. Patent No. 6,112,202 to Kleinburg ("Kleinburg"). Kleinburg does not cure the defects of Mangat with respect to claim 3. Therefore, claim 11 is allowable for at least the same reasons recited above and its own independent features.

Moreover, Kleinburg does not teach "targeting users of the network to which access to the link relationship will be provided by designating characteristics of the targeted users," as recited in claim 11. The cited section of Kleinburg teaches a user entering a keyword query and the system returning pages based on that query and additional pages with content-based links to the return pages. There is no discussion of targeting users, providing access to link relationships, let alone targeting user by designating characteristics of the targeted users. Consequently, claim 11 is not rendered obvious by Mangat and Kleinburg.

Similar reasoning applies to claim 17. Kleinburg does not disclose "entering one or more targeted user characteristics...comparing the entered targeted user characteristics to available user characteristics...targeting users using the comparison... and transmitting the first document object to the targeted users," as recited in claim 11. Again, Kleinburg merely teaches a user entering a keyword query and the system returning pages based on that query and additional

pages with content-based links to the returned pages. These teachings are not even related to the recited features of claim 17. There is no suggestion or disclosure in this or any other teaching of Kleinburg of the recited features. Accordingly, claim 17 is not rendered obvious by Mangat and Kleinburg.

CONCLUSION

In view of the above remarks, Applicants respectfully assert that the application is in condition for allowance. Prompt examination and allowance of claims 1-18 is respectfully requested. Applicants respectfully request that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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Sean S. Wooden, Reg. No.: 43,997

Andrews Kurth LLP

1701 Pennsylvania Ave, N.W.

Suite 300

Washington, DC 20006

Tel. (202) 662-2738

Fax (202) 662-2739